

### REMARKS

Claims 1 – 26 are pending. By this amendment, claims 1 and 21 are amended and claim 26 is cancelled. No new matter is introduced. Support for the amendment to claim 1 can be found at least at page 14, lines 13 – 19. Support for the amendment to claim 21 can be found at least in originally filed claim 26 and at page 12, lines 21 – 22. In view of the above amendment and the remarks that follow, Applicant respectfully request reconsideration of the claims and issuance of a Notice of Allowance.

On page 3, the Office Action rejects claims 1, 11, 13, 14, and 17 – 20 under 35 U.S.C. § 102(b) over U.S. Patent 5,089,956 to *MacPhail*. This rejection is respectfully traversed.

With respect to claim 1, the Office Action asserts that *MacPhail* teaches all of the elements recited in claim 1. Specifically, the Office Action asserts that *MacPhail* teaches a method of communication between components of a home subsystem for processing electronic books, and that *MacPhail* further teaches comparing a viewer identifier associated with the viewer with a data identifier associated with the data text. To support its assertion, the Office Action cites *MacPhail* at column 2, lines 60 – 64.

*MacPhail* is directed to methods of distributing at least two documents stored in an information processing system whereby the documents have a directed relationship. See column 2, lines 51 – 55. Thus, *MacPhail* is directed to a document management system, and does not disclose or suggest anything regarding communications between components of an electronic book home subsystem. Moreover, nothing in *MacPhail* discloses or suggests in a library, comparing a unique key associated with data text of an electronic book with a corresponding unique key of a viewer. *MacPhail's* process for transferring stapled documents from a storage server to an end user (EU) is described with reference to Figure 7 at column 8, lines 1 – 50. An identifier DID entered by the EU is assigned to a “stapler” document, and this identifier DID is then used to associate (“staple”) other documents that have a directed relationship (“stapled”) to the stapler document. Furthermore, the documents disclosed in *MacPhail* are not electronic books. Clearly, at no time does *MacPhail's* process compare a unique key associated with a viewer with a unique key associated with data text of an electronic book to permit sending the data text to the viewer.

In contrast to *MacPhail*, claim 1 as amended recites in a library, comparing a unique key associated with data text of an electronic book with a corresponding unique key of the viewer, and if the comparing step produces a match, sending the data text to the viewer. Since these features are not disclosed or suggested by *MacPhail*, claim 1 is patentable.

With respect to claim 13, the Office Action asserts that *MacPhail* discloses at column 1, lines 38 – 42 and column 4, lines 26 – 31, determining whether a packet has a unique packet identifier and determining whether the packet identifier matches a library identifier; and at column 4, lines 26 – 45 and 58 – 66, and column 1, lines 38 – 49, if the packet identifier matches the library identifier, storing the packet to a data file in the library storage. Applicant strongly disagrees. In fact, the above-cited references do not disclose anything remotely close to the elements recited in claim 13. Instead, the above-cited references merely disclose that a storage library stores documents according to a specific structure, referred to in column 4 of *MacPhail* as a Document Interchange Architecture. But nothing in the above-cited references to *MacPhail*, or in any other part of *MacPhail* disclose or suggest receiving a packet of text data, determining if the packet has a unique identifier, comparing the packet identifier to a library identifier, and if the packet and library identifiers match, storing the packet in a data file of the library.

In contrast to *MacPhail*, claim 13 recites receiving a packet of text data, determining if the packet has a unique identifier, comparing the packet identifier to a library identifier, and if the packet and library identifiers match, storing the packet in a data file of the library. Since these features are not disclosed or suggested by *MacPhail*, claim 13 is patentable.

Claim 11 depends from patentable claim 1 and claims 14 and 17 – 20 depend from patentable claim 13. For these reasons and the additional features they recite, claims 11, 14, and 17 – 20 are also patentable. Withdrawal of the rejection of claims 1, 11, 13, 14, and 17 – 20 under 35 U.S.C. § 102(b) is respectfully requested.

On page 6 the Office Action rejects claims 21 – 26 under 35 U.S.C. § 102(e) over U.S. Patent 5,509,704 to *Choudhury* (hereafter *Choudhury*). This rejection is respectfully traversed.

Considering claim 21, the Office action asserts that *Choudhury* teaches all that is claimed. Likewise, the Office Action asserts that *Choudhury* discloses all the elements of claim 26: “Choudhury further teaches the step of decompressing and decrypting comprises decompressing and decrypting a page of an electronic book at a time, as the page is displayed on the display (Choudhury: see for example, Column 3, Line 44, Column 4, Line 25 – 31 and Column 4, line 32).” Applicant strongly disagrees with this characterization of *Choudhury*.

*Choudhury* is directed to a method of protecting electronically published materials by using cryptographic protocols. However, nothing in *Choudhury* discloses or suggests decrypting pages of documents one page at a time, just before the page is displayed on a display. Furthermore, the citations to *Choudhury* that the Office Action relies on have

absolutely nothing to do with this feature. For example, *Choudhury* at column 3, line 44 states: "publisher which decrypts and displays the document." Clearly, this excerpt from *Choudhury* does not disclose or suggest page by page decryption as the page is displayed on a display. Similarly, the other citations relied on by the Office Action for rejecting claim 26 completely fail to disclose or suggest all of claim 26 elements.

In contrast to *Choudhury*, claim 21, which is amended to include all the features of claim 26, recites decompressing and decrypting an electronic book page by page, just before a page is displayed on a display of the viewer. Because *Choudhury* does not disclose or suggest all the features of claim 21, claim 21 is patentable. Claims 22 – 25 depend from patentable claim 21, and for this reason and the additional features they recite, claims 22 – 25 are also patentable. Claim 26 is cancelled and its rejection is moot. Withdrawal of the rejection of claims 21 – 26 under 35 U.S.C. § 102(e) is respectfully requested.

On page 8 the Office Action rejects claims 2 – 10 under 35 U.S.C. § 103(a) over *MacPhail* in view of *Choudhury*. This rejection is respectfully traversed.

Claims 2 – 10 depend from patentable claim 1. For this reason and the additional features they recite, claims 2 – 10 are also patentable. Withdrawal of the rejection of claims 2 – 10 under 35 U.S.C. § 103(a) is respectfully requested.

On page 10 the Office Action rejects claims 12 and 15 under 35 U.S.C. § 103(a) over *MacPhail* in view of *Choudhury* and further in view of U.S. Patent 4,985,697 to *Boulton* (hereafter *Boulton*). This rejection is respectfully traversed.

Claim 12 depends from patentable claim 1 and claim 15 depends from patentable claim 13. For these reasons and the additional features they recite, claims 12 and 15 are also patentable. Withdrawal of the rejection of claims 12 and 15 under 35 U.S.C. § 103(a) is respectfully requested.

On page 11 the Office Action rejects claim 16 under 35 U.S.C. § 103(a) over *MacPhail* in view of U.S. Patent 4,644,470 to *Feigenbaum* (hereafter *Feigenbaum*). This rejection is respectfully traversed.

Claim 16 depends from patentable claim 13, and for this reason and the additional features it recites, claim 16 is also patentable. Withdrawal of the rejection of claim 16 under 35 U.S.C. § 103(a) is respectfully requested.

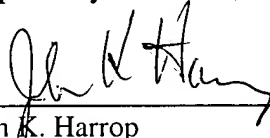
In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance. Prompt examination and allowance are respectfully requested.

Should the Examiner believe that anything further is desired in order to place the

Appl. No. 09/722,519  
Amendment and Response dated February 10, 2005  
Reply to Office Action of August 10, 2004

application in even better condition for allowance, the Examiner is invited to contact  
Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,



Date: February 10, 2005

---

John K. Harrop  
Registration No. 41,817  
**Andrews Kurth LLP**  
1701 Pennsylvania Ave, N.W.  
Suite 300  
Washington, DC 20006  
Tel. (202) 662-3050  
Fax (202) 662-2739